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19	RANGERS, INC.	
20	UNITED STATES	DISTRICT COURT
21	CENTRAL DISTRICT OF CALI	FORNIA, WESTERN DIVISION
22		
23	CORY SPENCER, an individual;	CASE NO. 2:16-cv-02129-SJO (RAOx)
24	DIANA MILENA REED, an individual; and COASTAL	PLAINTIFFS' APPLICATION FOR
25	PROTECTION RANGERS, INC., a	LEAVE TO FILE DOCUMENTS UNDER SEAL
26	California non-profit public benefit	Filed Concurrently with Declaration of Samantha Wolff; Redacted Version of
27	corporation,	Samantha Wolff; Redacted Version of Documents Proposed to be Filed Under
28	Plaintiffs,	Documents Proposed to be Filed Under Seal; Unredacted Version of Documents Proposed to be Filed Under Seal: and

Case No. 2:16-cv-02129-SJO (RAOx)

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[Proposed] Order 1 V. 2 LUNADA BAY BOYS; THE 3 Complaint Filed: March 29, 2016 INDIVIDUAL MEMBERS OF THE Trial Date: November 7, 2017 4 LUNADA BAY BOYS, including but not limited to SANG LEE, BRANT BLAKEMAN, ALAN JOHNSTON 6 AKA JALIAN JOHNSTON, MICHAEL RAE PAPAYANS, ANGELO FERRARA, FRANK FERRARA, CHARLIE FERRARA, and N. F.; CITY OF PALOS VERDES ESTATES; CHIEF OF POLICE JEFF 10 KEPLEY, in his representative capacity; and DOES 1-10, 11 12 Defendants. 13 14 Pursuant to Local Rule 79-5, Plaintiffs Cory Spencer, Diana Milena Reed, 15 and the Coastal Protection Rangers, Inc. ("Plaintiffs") hereby apply for leave of 16 Court to file Exhibits 15 and 21 to the Declaration of Kurt Franklin filed in support 17 of Plaintiffs' Opposition to the City Defendants' Motion for Summary Judgment 18 ("Franklin Decl."), under seal. Exhibit 21 is a report prepared by a third-party 19 investigator retained by the City on an investigation into the source of a leak of a 20 Palos Verdes Estates Police Department undercover operation ("Report"). This 21

22 Report was produced in discovery by the City of Palos Verdes Estates (City) and

23 marked as "CONFIDENTIAL" pursuant to the parties' stipulated protective order.

See Franklin Decl. at ¶ 31. Although Plaintiffs dispute the confidential nature of

25 this document, Plaintiffs nonetheless file this request for to file the Report under seal

26 in accordance with the Local Rules and the parties' stipulated protective order.

Exhibit 15 is Defendant Alan Johnston's Cell Phone Record Detail and contains the

telephone numbers of Defendant Johnston and various third parties. This document

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1	was produced in discovery by Defendant Johnston and is likely protected from	
2	disclosure under the parties' stipulated protective order, though this document was	
3	not stamped as "Confidential" by Defendant Johnston. <i>See</i> Franklin Decl. at ¶ 16.	
4	Counsel for the City and Defendant Johnston were both informed of Plaintiffs'	
5	intent to seek leave to file Exhibits 21 and 15 under seal. See Declaration of	
6	Samantha Wolff In Support of Application for Leave to File Under Seal, filed	
7	concurrently herewith, at $\P\P$ 2, 6.	
8	DATED: July 31, 2017 HANSON BRIDGETT LLP	
9		
10	_	
11	By: /s/ Samantha D. Wolff KURT A. FRANKLIN	
12	LISA M. POOLEY	
13	SAMANTHA D. WOLFF TYSON M. SHOWER	
14	LANDON D. BAILEY	
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